

== Start of Comment to RM-10762 =====

I am OPPOSED to one segment of Garmin's petition made in RM-10762.

The petitioner has requested the ability for a radio (possibly 'selected' by sub-audible tone codes like CTCSS) receiving the position data sent by another user to automatically respond with their own position data. This would clearly violate the current requirement for the second radio's user to monitor the frequency before transmitting. The request also goes against the Commission's previous action of not allowing similar automated data responses on other services (like MURS - where 'digi-peater' devices or similar operations are not permitted).

I can see the likely scenario of a cascading avalanche of responses from other radios -- that might be set to the same (or none) CTCSS tone code -- possibly blocking emergency traffic or the transmissions of others. This has the possibly of making the frequency unusable. I see nothing in the proposal that would add some sort of anti-collision protocol similar to that employed on Ethernet (wired or wireless) networks to avoid such potential problems.

I would make much more sense for the receiving radio's operator to be alerted to the sender's position request (via an aural, visual, or vibrating alert) and then to be forced to perform the same manual action (i.e.; depress the PTT button/switch) as the sender to transmit a response.

User who transmit without monitoring (frequently sending annoying 'call tones' repetitively) are already a serious problem in many urban and even suburban areas. Adding additional automated transmissions could cause the GMRS to be less useful to licensed users who are operating correctly.

Respectfully submitted on 13 OCT 2003

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== End of Comment to RM-10762 =====